

November 2, 2001

Dr. William S. Stokes  
Director, NICEATM (MD EC-17)  
National Institute of Environmental Health Sciences  
P.O. Box 12233  
Research Triangle Park, NC 27709

Dear Dr. Stokes,

I urge you to please stop the horrifically cruel "HPV - toxic effects of chemicals" testing being done en-masse. NIEHS should adopt the new non-animal test immediately. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.

Since the 1920's scientists have studied acute toxicity using lethal poisoning tests, animals are force fed, injected with, or forced to inhale chemicals until they die. These tests are not only cruel, they are virtually irrelevant to humans, producing inaccurate and misleading results in most cases. These tests have never been proved to be scientifically reliable, reproducible, or relevant to humans. The non-animal cell culture tests have been found to be highly predictive of chemical toxicity in humans.

NIEHS recommends using the non-animal methods to set the starting dose for further animal poisoning tests. Though it may reduce the number of animals killed in acute poisoning studies, it is not enough. The in vitro cell culture tests should COMPLETELY REPLACE the use of animals in lethal dose tests.

In closing, at a minimum, ALL government agencies that currently require the acute animal-poisoning studies should IMMEDIATELY incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Respectfully,

Cathy Palamara-Noonan